

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**Tangipahoa Parish Council Government
Tangipahoa Parish Regional Solid Waste Facility
Independence, Tangipahoa Parish, Louisiana
Agency Interest Number: 43470
Activity Number: PER20060002
Proposed Permit Number: 2840-00234-V0**

I. APPLICANT

Company:

Tangipahoa Parish Council Government
PO Box 215
Amite, Louisiana 70422-0215

Facility:

Tangipahoa Parish Regional Solid Waste Facility (TRSWF)
57510 Hano Rd
Independence, Tangipahoa Parish, Louisiana
Approximate UTM coordinates are 266.7 kilometers east and 3397.3 kilometers north.

II. FACILITY AND CURRENT PERMIT STATUS

The Tangipahoa Parish Government (TPG) currently owns and operates the Tangipahoa Parish Landfill (TRSWF). TRSWF is a Municipal Solid Waste Landfill (MSWLF) that is located in Independence, Tangipahoa Parish, Louisiana. TRSWF has a total permitted design capacity of approximately 3.7 million megagrams. The requirements of the New Source Performance Standards (NSPS) 40 CFR 60 Subpart WWW for municipal solid waste landfills states that all landfills with a design capacity greater than 2.5 million megagrams and 2.5 million cubic meters is required to obtain a Part 70 operating permit.

Tangipahoa Parish Council Government - Tangipahoa Parish Regional Solid Waste Facility is a designated Part 70 source.

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III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application was submitted on December 7, 2007 requesting a Part 70 operating permit for TRSWF. Additional information dated June 11, 2007 was also submitted.

At this time, TRG is not required to submit an environmental assessment statement pursuant to Louisiana Environmental Quality Act, La. R.S. 30:2018 given that TRSWF does not exceed the major source threshold for air pollutants under the rules of the Department.

Project

TRSWF is a Type II landfill that serves as a collection and disposal point for municipal, commercial, C&D, and wood wastes generated in Tangipahoa Parish. The decomposing refuse contained within the landfill produces landfill gas (LFG), which is primarily composed of CH₄, CO₂, and other trace organic compounds. Additionally, there are emissions from storage tanks, paved/unpaved roads, and a leachate pond onsite. TRSWF does not accept asbestos-containing waste.

Proposed Permit

Permit 2840-00234-V0 will be the initial Part 70 operating permit for the Tangipahoa Parish Regional Solid Waste Facility.

Permitted Air Emissions

Estimated emissions in tons per year are as follows:

Pollutant	Emissions
PM ₁₀	93.11
SO ₂	-
NO _x	-
CO	-
VOC *	12.46

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IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Applicability and Exemptions of Selected Subject Items

ID No:	Requirement	Notes
UNF 001 Entire Facility – TRSWF	NESHAP Subpart AAAA – Municipal Solid Waste Landfills (40 CFR 63.1930-1990)	EXEMPT. The facility's NMOC concentration is less than 50 Mg/yr. The facility shall comply with the standard when NMOC concentrations exceed 50 Mg/yr.
	40 CFR 68 – Chemical Accident Prevention Provision	DOES NOT APPLY. The facility does not have more than the threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115.
	40 CFR 82 – Protection of Stratospheric Ozone	DOES NOT APPLY. There are no applicable CFC chillers/coolers onsite.
	Chemical Accident Prevention and Minimization of Consequences [LAC 33:III.5901]	DOES NOT APPLY. A risk management plan is not required at this time since the threshold for a regulated substance is not exceeded.
EQT 002 Gas Storage	NSPS Subpart K – Standards of Performance for Storage Vessels for Which Construction, Reconstruction, or Modification Commences after June 11, 1973 and Prior to May 19, 1978. [40 CFR 60.110]	DOES NOT APPLY. The storage vessel is less than 40,000 gallons.

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ID No:	Requirement	Notes
EQT 002 Gas Storage Tank	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum liquids for Which Construction, Reconstruction, or Modification Commences after May 18, 1978 and Prior to July 23, 1984. [40 CFR 60.110a]	DOES NOT APPLY. The storage vessel is less than 40,000.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. The storage vessel is less than 20,000 gallons.

Prevention of Significant Deterioration/Nonattainment Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations), New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD does not apply.

Streamlined Equipment Leak Monitoring Program

Unit or Plant Site	Program Being Streamlined	Stream Applicability	Overall Most Stringent Program
Tangipahoa Parish Regional Solid Waste Facility	None	-	-

MACT Requirements

The facility is not a major source of Toxic Air Pollutants pursuant to LAC 33:III.Chapter 51.

If the facility exceeds the 50 Mg/yr NMOC limit established in 40 CFR 63, Subpart AAAA, it will be required to install a Landfill Gas Collection and Control System (GCCS).

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Air Quality Analysis

Dispersion Model (s) Used: None

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

There is no permit shield requested in this permit action.

VI. PERIODIC MONITORING

Federal regulation 40 CFR 64 – Compliance Assurance Monitoring is not applicable to this facility.

The facility shall be required to monitor NMOC emission rates annually until the 50 Mg/yr limit established in NSPS 40 CFR 63, Subpart AAAA is exceeded.

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

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Hydrogen Sulfide (H_2S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM_{10} – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO_2) – An oxide of sulfur.

Sulfuric Acid (H_2SO_4) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than

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those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.